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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 GJERGI LUKE JUNCAJ,
14 Defendant.

Case No.: 22-CR-008-JCM-EJY

Government Disclosure Statement

15 The undersigned trial attorney has sought to contact Navid Ashraf, Assistant
16 Federal Public Defender and counsel of record for defendant Gjergi Luke Juncaj, by phone
17 and email on multiple occasions to discuss scheduling of discovery in the instant case.
18 Although Mr. Ashraf responded by email on February 7, 2022, Mr. Ashraf was unavailable
19 for a discovery scheduling call. It is expected that he will be available to discuss discovery
20 in the coming days.

21 The Government has agreed to provide discovery in this case as described below:
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23
24

Discovery Schedule

- A. The Government has provided or will provide or permit the defendant to inspect and copy or photograph:
 - (1) All statements, documents, and objects, including audio or video recordings, required to be disclosed under Federal Rules of Criminal Procedure 16(a)(1)(A)-(F).
 - (2) All search warrants and supporting affidavits, which relate to evidence that may be offered at trial.
 - (3) The Government will provide expert disclosures as required under Federal Rule of Criminal Procedure 16(a)(1)(G).
 - (4) To date, the Government has made the following disclosures: documents within the bates stamp range DOJ-00000001 to DOJ-00000729.
- B. The Government has provided any known exculpatory information to the defendant. The Government will provide any subsequently discovered exculpatory information reasonably promptly upon its discovery. The Government will provide impeachment information relating to government witnesses who will testify at a pre-trial hearing, trial, or sentencing sufficiently in advance of the hearing, trial, or sentencing to allow the hearing, trial, or sentencing to proceed efficiently.
- C. The Government hereby makes any and all demands for reciprocal disclosures from the defendant under Federal Rules of Criminal Procedure 12.1, 12.2, 12.3, and 16, including but not limited to the following, to be provided prior to trial:
 - (1) All documents, objects, and reports of examination required under Federal Rules of Criminal Procedure 16(b)(1)(A) and (B).

- 1 (2) All expert disclosures required under Federal Rule of Criminal
- 2 Procedure 16(b)(1)(C).
- 3 (3) All notices of any defenses under Federal Rule of Criminal Procedure
- 4 12.1.
- 5 (4) Any summaries, charts, or calculations the defense intends to offer at
- 6 trial.

7 D. The Government will no later than 5 days before trial or at such subsequent time as
8 the Government learns any of the following information:

- 9 (1) Disclose any summaries, charts, or calculations the Government
- 10 intends to offer at trial.
- 11 (2) Identify recordings, transcripts of recordings, or portions thereof the
- 12 Government intends to offer at trial.
- 13 (3) Disclose any reports or memoranda of interviews of witnesses the
- 14 Government intends to call in its case in chief.
- 15 (4) Disclose any statements of witnesses under Title 18, United States
- 16 Code, Section 3500.

17 E. If the Government withholds the disclosure of items subject to discovery under
18 Federal Rule of Criminal Procedure 16 or case law or statute, it will either: (1)
19 provide notice to the defense of its intent to withhold disclosure and describe the
20 nature of the item and the basis for withholding disclosure; or (2) submit in camera
21 a motion to the court for a protective order describing the nature of the item, the
22 basis for withholding disclosure, and the need for in camera review and any sealing
23 of the record. The Government requests that, if the defendant withholds the
24 disclosure of any such item(s), it provide such notice to the Government.

1 The disclosures and reciprocal disclosures set forth above apply to those objects,
2 documents, items, and other disclosure matters that are in the possession, custody,
3 or control of the parties at the time the obligation to disclose arises. The
4 Government recognizes that it has a continuing duty to provide disclosures up to
5 and through trial as to any matters required to be disclosed by statute, rule, or the
6 United States Constitution. Nothing in this statement is intended to create any
7 rights for the defendant or in any way restrict or expand the remedies available to
8 the Court for any breach of any disclosure obligations.

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10 The Government holds itself available to make good faith efforts to confer with
11 defense counsel to resolve informally any dispute over the scope, manner, and
12 method of disclosures before seeking relief from the Court.

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14 DATED: February 10, 2022

15 COREY R. AMUNDSON
16 Chief, Public Integrity Section

17 /s/ Jonathan E. Jacobson
18 Jonathan E. Jacobson
Trial Attorney

Certificate of Service

I, Jonathan Jacobson hereby certify that I am an employee of the United States Department of Justice's Public Integrity Section and that on this day I served an electronic copy of the above **Government Disclosure Statement** on Counsel of Record via Electronic Case Filing (ECF).

Dated: February 10, 2022

/s/ Jonathan E. Jacobson
Jonathan E. Jacobson
Trial Attorney